07 Cr.

INFORMATION

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

JEFFREY BLUE,

- v. -

Defendant.

COUNT ONE

(Bank Fraud Conspiracy)

The United States Attorney charges:

- 1. From at least in or about March 2005 through in or about May 2005, in the Southern District of New York and elsewhere, JEFFREY BLUE, the defendant, together with others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1344.
- 2. It was a part and an object of the conspiracy that JEFFREY BLUE, the defendant, together with others known and unknown, unlawfully, willfully, and knowingly, would and did execute, and attempt to execute, a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, said financial institutions, by means of false and fraudulent pretenses,

representations, and promises, to wit, BLUE deposited into his bank account at RBC Centura Bank at least approximately two checks drawn on accounts controlled by Steven Riddick, that BLUE knew to be proceeds of fraudulent activity, in violation of Title 18, United States Code, Section 1344.

OVERT ACTS

- 3. In furtherance of the conspiracy and to effect the illegal object thereof, JEFFREY BLUE, the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:
- a. On or about April 6, 2005, JEFFREY BLUE deposited into his bank account at RBC Centura Bank a check in the amount of approximately \$5,000.
- b. On or about April 21, 2005, JEFFREY BLUE deposited into his bank account at RBC Centura Bank a check in the amount of approximately \$8,500.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Money Laundering Conspiracy)

The United States Attorney further charges:

- 4. From at least in or about March 2005 through in or about May 2005, in the Southern District of New York and elsewhere, JEFFREY BLUE, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1956(a)(1)(B)(i).
- It was a part and an object of the conspiracy that from 5. at least in or about March 2005 through in or about May 2005, in the Southern District of New York and elsewhere, JEFFREY BLUE, the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions, which in fact involved proceeds of specified unlawful activity, to wit, bank fraud, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

OVERT ACTS

- 6. In furtherance of the conspiracy and to effect the illegal object thereof, JEFFREY BLUE, the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:
- a. On or about April 6, 2005, JEFFREY BLUE deposited into his bank account at RBC Centura Bank a check in the amount of approximately \$5,000.
- b. On or about April 21, 2005, JEFFREY BLUE deposited into his bank account at RBC Centura Bank a check in the amount of approximately \$8,500.

(Title 18, United States Code, Section 1956(h).)

MICHAEL J. GARCIA United States Attorney

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- V. -

JEFFREY BLUE,

Defendant.

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07 Cr. (KMK)

(Title 18, United States Code, Sections 1349 and 1956(h)).

MICHAEL J. GARCIA United States Attorney.